



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Prashant K. Gupta  
Manager, Remediation & Evaluation Services  
Honeywell International, Inc.  
4101 Bermuda Hundred Road  
Chester, VA 23836

Re: Allied Chemical Site  
Front Royal, Virginia

Dear Mr. Gupta:

Pursuant to Section XXIV of the Administrative Order issued in connection with the Allied Chemical Site ("Order"), Docket No. III-98-091-DC, and based on the representations made by Honeywell International, Inc. ("Honeywell") in its Final Report submitted pursuant to Paragraph 8.11 of the Order, EPA hereby notifies you that Honeywell has performed and completed the response action specified in Section VIII of the Order. Please note that Honeywell may have continuing obligations under the Order under Sections XII ("Reservation of Rights"), XIII ("Other Claims"), XVI ("Liability of the United States"), and XXII ("Record Retention").

Thank you for your cooperation in conducting this work. As always, should you have any questions, please feel free to contact me at (215) 814-3436.

Sincerely,

A handwritten signature in dark ink, appearing to read "Eduardo Rovira, Jr.", is written over a horizontal line.

Eduardo Rovira, Jr.,  
On-Scene Coordinator  
Eastern Response Branch

cc: Allison Gardner (3RC42)  
Joe Lewandowski (ERM)

Sent Via Certified Mail

13 May 2009

Mr. Eduardo Rovira  
On-Scene Coordinator  
Eastern Response Branch  
U.S. EPA Region III  
324 Maple Street  
Ambler, PA 19002



Re: Former Allied Chemical Front Royal Works Site, Front Royal, VA  
EPA ID VAD003064003.

Dear Mr. Rovira:

On behalf of Honeywell International, Inc. (Honeywell), Environmental Resources Management, Inc. (ERM) in accordance with Unilateral Administrative Order (Order) Docket No. III-98-091-DC) respectively requests that EPA issue a Notice of Compliance for the subject Site. Included with this letter is the certification of compliance signed by a responsible Honeywell official in accordance with paragraph 18.2 of the Order.

Specifically, Honeywell has completed the Removal Action for the Former Allied Chemical Works Site in accordance with Item 8.3 of the Order. Provided below are activities that were completed in the sequence specified by Item 8.3 of the Order. In addition, please find an addendum that responds to your comments raised in your email of April 28, 2009 to Joseph Lewandowski.

The removal actions undertaken occurred over a period of time and were addressed in three separate tasks. All documents referred to in this letter have been previously forwarded to EPA.

### **Background**

The Site was a former sulfuric acid manufacturing facility constructed in 1945 under contract from the United States government with the Allied Chemical and Dye Corporation. Shortly after World War II, the United States government declared the facility surplus and sold it to Allied Chemical and Dye Corporation, who continued manufacturing sulfuric

acid at the facility until May 1986 when it was sold to General Chemical Corporation. The facility was subsequently purchased by Avtex Fibers, Inc., owners of the adjacent rayon plant, and used as a storage and transfer facility. All operations ceased at the facility in November 1989. On or about March 2000 General Chemical Corporation resumed ownership due to Avtex Fibers' filing for bankruptcy. The property was transferred to Honeywell International Inc. in 2004 as a result of a bankruptcy settlement with General Chemical Corporation.

In September 1998, the USEPA issued a Unilateral Administrative Order for Removal Response Action to AlliedSignal, Inc., General Chemical Corporation and Avtex Fibers Front Royal, Inc. The items required under 8.3 of the Order have been implemented in three separate tasks, they were:

1. Decontamination and demolition of the former sulfuric acid manufacturing plant, including associated buildings, process tanks, piping, and the neutralization and removal of the sulfur slag pile. These activities were conducted in 2001 and 2002.
2. Excavation and removal for off-site disposal of two impoundments, the bermed pit, a perimeter engineered surface water drainage ditch, process water discharge ditch, and sulfur residues. These activities were conducted in 2007 and 2008.
3. Installation of groundwater monitoring wells to detect any plumes that may have originated from the Site. Quarterly groundwater samples results confirmed no groundwater effects from the site and the wells were abandoned in 2006.

*Administrative Order 8.3 Items*

- a. **Restrict access and provide security at the Site during the performance of work required by this Order;**

Health and Safety Plans were developed and implemented for each task. These Plans provided for Site security and limiting access. The Plans were submitted and approved by EPA. The following is a list of the Plans for each task:

Decontamination and demolition - *Site-Specific Health and Safety Plan for the Response Action Plan, Allied Front Royal Site, Front Royal, Virginia, April 1999.*

Excavation and removal - *Site-Specific Health and Safety Plan: Former Allied Chemical - Front Royal Works Site, August 2, 2007.*

Monitoring wells - *Project Health and Safety Plan; Allied Front Royal Site, 3 December 2004.*

**b. Develop and submit to EPA for approval an extent of contamination study which will characterize the nature, concentration, extent and depth of hazardous substances, located on-site, and which will provide sufficient data to evaluate and develop plans for:**

- **treatment of soils, sediments and contaminated and potentially contaminated materials or excavation and off-site disposal for soils, sediments and other contaminated and potentially contaminated materials such as concrete pads and paved areas;**
- **treatment or off-site disposal of contaminated surface water; and**
- **removal and off-site disposal of contamination in process vessels, equipment and piping and containers, including, but not limited to jars, cans, pails, drums and bags.**

Extent of contaminations was submitted to EPA for review and approval. The following is a list of plans for each task:

Decontamination and demolition - *Response Action Plan for Vessel/Line Characterization and Extent of Contamination Study Allied Front Royal Site, Front Royal, Virginia, April 1999.*

*Response Action Plan February 2001 Addendum Extent of Contamination Study - Environmental Sampling Program Allied Front Royal, Virginia.*

*Risk Evaluation and Response Action Alternative Evaluation  
Allied Front Royal Site Front Royal, Virginia. May 2002*

*Excavation and removal - Sampling and Analysis Plan for the  
Surface Water Impoundments and Ditches; Former Allied  
Chemical Front Royal, Virginia, 19 September 2005.*

*Monitoring wells - Monitoring Well Work Plan Revised Allied  
Front Royal Site Front Royal, Virginia September 8, 2003.*

**c. Implement the approved extent of contamination  
study identified in subparagraph 8.3(b), above;**

The extent of contamination studies were implemented upon  
EPA approval. Listed below is the schedule for the  
implementation of the studies:

Decontamination and demolition - Study was implemented in  
February 2000.

Excavation and removal - Study was implemented in October  
2005.

Monitoring Wells - Study initiated with the installation of wells  
in January 2004 and subsequent sampling of the wells from  
December 2004 to September 2005.

**d. After identifying the extent of contamination at the  
Site, submit to EPA for approval proposed clean-up  
level(s) for soil, sediments, surface water and other  
materials such as concrete pads, paving, containers,  
piping and process vessels and equipment which  
are sufficient to protect human health and the  
environment;**

*Decontamination and demolition - Risk Evaluation and  
Response Action Alternative Evaluation, Allied Front Royal  
Site, Front Royal, Virginia. May 2000.*

*Excavation and removal - Engineering Evaluation/ Cost  
Analysis Work Plan Allied Chemical- Front Royal Works Site,  
Front Royal, Virginia. September 23, 2005*

Monitoring wells - quarterly monitoring of wells conducted  
from December 2004 to September 2005.

- e. **Properly treat or excavate all soil, sediment, concrete pads and paving located on the Site which contains hazardous substances above the EPA-approved clean-up level(s);**

Clean-up and removal was implemented and completed in accordance with approved plans. The following is a list of reports documenting the clean-up and removal activities:

Decontamination and demolition - *Decontamination and Demolition Report Former Sulfuric Acid Manufacturing Facility (Former Allied Front Royal Site Front Royal, Virginia)*. July 3, 2002.

Excavation and removal - *Removal Action Certification Report Site EPA ID VAD000306400, Former Allied Chemical - Front Royal Works Site, Front Royal, Virginia*. April 2008.

Letter to USEPA requested the issuance of a Notice of Compliance for the Site, 18 June 2008. The letter confirmed that the limited number of minor activities identified during an earlier inspection had been completed.

Monitoring wells - monitoring wells abandoned in November 2006. December 5, 2006 letter to EPA transmitting Well Abandonment form for monitoring wells

- f. **Properly remove from process vessels, equipment and piping all hazardous substances above the EPA-approved clean-up level(s);**

Hazardous substances were removed from process vessels, equipment and piping as documented in *Response Action Plan/Implementation Phase Decontamination and Demolition Report Former Sulfuric Acid Manufacturing Facility (Former Allied Front Royal Site Front Royal, Virginia)*. July 3, 2002.

- g. **Submit to EPA for review and approval a plan providing for off-site disposal, including any necessary treatment of all contaminated media on-site in excess of the EPA-approved clean-up level(s) or to a RCRA approved disposal facility in accordance with paragraph 8.12, below. That plan shall at a minimum include a description of:**

- i) **Disposal of excavated materials such as soil, sediment, concrete pads and paved areas;**
- ii) **Disposal of hazardous substances removed from process vessels, equipment and piping;**
- iii) **Disposal of hazardous substances in containers;**
- iv) **Treatment of water containing hazardous substances to meet requirements of the disposal facility, if disposal of this material at a disposal facility is proposed;**
- v) **Treatment of water containing hazardous substances to meet requirements under the National Pollutant Discharge Elimination System ("NPDES") and/or water quality criteria, if discharge to local surface waters is proposed; and**
- vi) **Consideration of reuse or recycling of appropriate materials, means to destroy contaminants and measures to prevent the spread of pollution to the maximum extent practicable and in accordance with paragraph 8.12 below;**

Documentation of off-site disposal and treatment of contaminated media on site is included in the following reports:

Decontamination and demolition - *Response Action Plan/Implementation Phase Decontamination and Demolition Report Former Sulfuric Acid Manufacturing Facility (Former Allied Front Royal Site Front Royal, Virginia)*. July 3, 2002.

Excavation and removal - *Engineering Evaluation/Cost Analysis for Selected Areas of Concern, former Allied Chemical - Front Royal Works Site, Front Royal, Virginia*. February 2007.

Monitoring wells - *Monitoring Well Work Plan revised Allied Front Royal Site Front Royal Virginia*. September 8, 2003.

- h. **Implement the EPA-approved disposal plan identified in subparagraph 8.3(g), above.**

The disposals of materials were handled in accordance with approved plans. The following is a schedule of the activities for each phase:

Decontamination and demolition - disposal plan activities were implemented and completed between August 6 and December 7, 2001 and May 20 and June 7, 2002.

Excavation and removal - disposal plan activities were implemented and completed between November 5 and December 14, 2007. Additional minor punch list activities were completed in May 2008

Monitoring wells - monitoring results determined groundwater quality was consistent with background and no impact from facility manufacturing operations had occurred. Groundwater collected in containers during monitoring events was placed on the ground during well abandonment.

**J. Conduct post removal action sampling to ensure that levels of hazardous substances in all contaminated media at the Site are below the EPA approved clean-up levels after completion of the work described in subparagraphs 8.3(g) and (h), above;**

Decontamination and demolition - a variety of cleaning and decontamination procedures were used to remove waste materials and residues from facility storage tanks, process vessels, and associated structures. In general, liquids were pumped or drained from piping, tanks, and vessels. Solids were removed manually. A decontamination bath with a weak alkaline solution was used for the decontamination and neutralization of piping and equipment. Larger vessels and tanks were decontaminated in place with a water rinse via both low and high pressure. Decontamination fluids were checked for pH to ensure neutralization, then collected and consolidated for disposal. Similar solid and liquid waste streams were consolidated, where possible, and all waste streams were packaged in accordance with USDOT and USEPA regulations and managed accordingly. After decontamination, the demolition of the storage tanks, process vessels, and associated structures was accomplished with mechanical grapples and shears. All materials were sampled or tested prior to



manifesting for shipment to the designated disposal facility. Manifests and test results are contained in:

*Response Action Plan/Implementation Phase Decontamination and Demolition Report Former Sulfuric Acid Manufacturing Facility (Former Allied Front Royal Site Front Royal, Virginia). July 3, 2002.*

Excavation and removal - site activities included demolition of ancillary structures; excavation and removal of soil and sediment; placement and grading of structural and topsoil fill materials; and demolition of cooling tower vault. Impacted soils were excavated to the depth determined by the Work Plan sample results and visual observation. The excavated soils were manifested as non-hazardous to the designated disposal facility. Manifests and test results are contained in:

*Removal Action Certification Report Site EPA ID VAD0003064003 Former Allied Chemical - Front Royal Works Site Front Royal, Virginia. April 2008.*

Monitoring wells - analytical results are included in the quarterly groundwater monitoring reports.

- j. Treat and/or remove and properly dispose of contaminated water generated as a result of the above items (e.g., equipment and sampling-related fluids) in accordance with promulgated requirements and standards;**

Decontamination and demolition - liquid generated during decontamination activities (i.e., washing of tanks and vessels) was consolidated and shipped to the designated disposal facility as non-hazardous. Manifests and tests results are included in:

*Response Action Plan/Implementation Phase Decontamination and Demolition Report Former Sulfuric Acid Manufacturing Facility (Former Allied Front Royal Site Front Royal, Virginia). July 3, 2002.*

Excavation and removal - storm water from the impoundments and the cooling tower vault was treated on-site and discharge on-site via spray irrigation. Documentation regarding handling of water is included in:

*Removal Action Certification Report Site EPA ID  
VAD0003064003 Former Allied Chemical - Front Royal Works  
Site Front Royal, Virginia. April 2008.*

- k. Provide site specific health and safety measures, including preparation and implementation of a Health and Safety Plan ("HASP") for actions to be performed at the Site, to protect the health and safety of workers, other personnel and the public from the hazardous substances and work-related health and safety hazards during the performance of the response action specified herein. The HASP shall, as appropriate, provide for proper decontamination of personnel and equipment, monitoring and control of offsite migration of hazardous substances during the performance of activities at the Site and protection of the Site pursuant to this Order. Health and safety requirements in the HASP shall be at least as stringent as those set forth in Occupational Safety and Health Administration and EPA requirement, including but not limited to, requirements contained in 29 CFR § 1910.120 and/or EPA Standard Operating Safety Guides (June 1992);**

Decontamination and demolition - multiple HASPs were prepared depending upon the activities, they are:

*Site-Specific Health and Safety Plan for the Response Action Plan, Allied Front Royal Site, Front Royal, Virginia, April 1999.*

Excavation and removal - *Site-Specific health and Safety Plan: Former Allied Chemical - Front Royal Works Site August 2, 2007.*

Monitoring wells - *Project Health and Safety Plan Allied Front Royal Site 3 December 2004.*

- l. Obtain a Hazardous Waste Generator Identification Number;**

The Hazardous Waste Generator Identification Number for the site is VAR000501833

- m. Describe how the Removal Action will attain applicable or relevant and appropriate requirements ("ARARS") under federal and state environmental laws, as required by the NCP and paragraph 14.1 of this Order; and**

The ARARs were addressed in the following documents:

Decontamination and demolition - *Risk Evaluation and Response Action Alternative Evaluation, Allied Front Royal Site, Front Royal, Virginia.* May 2000.

Excavation and removal - *Engineering Evaluation/Cost Analysis for Selected Areas of Concern, former Allied Chemical - Front Royal Works Site, Front Royal, Virginia.* February 2007.

- n. Develop and follow an expeditious schedule for implementation of the RAP.**

Schedules were developed and submitted to EPA for approval for each task. The following is a list summarizing the scheduled removal activities:

Decontamination and demolition August 2001 - December 2001 - storage tanks, process vessels and associated structures were cleaned and removed.

May 2002 - June 2002 - sulfur pile neutralized and removed from Site.

Excavation and removal November 2007 - December 2007 - impoundments, the bermed pit and perimeter ditches cleaned and removed. Also cooling tower vault pumped and backfilled.

May 2008 - regrading and seeding conducted. Also sulfur residues were removed off-site.

Monitoring wells January 2004 - wells installed and groundwater sampled.

December 2004 - quarterly sampling and analysis of monitoring wells.

March 2005 - quarterly sampling and analysis of monitoring wells.

July 2005 - quarterly sampling and analysis of monitoring wells.

September 2005 - quarterly sampling and analysis of monitoring wells.

November 2006 - wells abandoned.

It is therefore our opinion that the removal activities have been effectively completed and documented; consequently, ERM hereby requests the Issuance of a Notice of Compliance for the Site.

Sincerely,

Joseph P. Lewandowski  
*Principal*

cc: Prashant Gupta - Honeywell International, Inc.  
John Mojka - Honeywell International, Inc.  
Darren Quillen - ERM

enclosures

Except as provided below, I certify that the information contained in or accompanying this letter report is true, accurate, and complete.

As to those portion(s) of this letter report, for which I cannot personally verify its accuracy, I certify under the penalty of law that this letter report and all its attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: 

Name (print): PRASHANT K. GUPTA  
HONEYWELL

Title: MANAGER, REMEDIATION & EVALUATION SERVICES

## *Addendum*

## Addendum

In an April 28, 2009 electronic message from Eduardo Rovira to Joe Lewandowski the following comments concerning the Removal Action Certification Report dated April 2008 were raised. Responses to these comments is provided.

### **Section 4.2., Page 11, Paragraph 1 and Appendix A.**

The section states that "At the outset of the project, both the eastern and western impoundments were full of storm water due to recent precipitation. Consequently, ERM submitted a modification request to the USEPA, dated November 14, 2007, with a proposal to manage the accumulated storm water on-site, rather than transportation and off-site management." The section goes on to describe a five-step method for pumping, collecting and filtering both through a sediment filter and an activated granular carbon unit, prior to discharging the storm water to the environment.

In Appendix A, the letter dated November 7, 2007 further reinforces this process. Yet, the email correspondence dated November 16, 2007, states that "Further analysis of the situation verifies that carbon treatment of the surface water is unnecessary." However, the method of analysis, and/or determining factor(s) are not explained, please explain.

.....

this will help anyone reading the report to more clearly understand the remedial technologies described in Section 4.2.

*Water samples collected from the impoundment during the evaluation phase were non-detect for polycyclic aromatic hydrocarbons and BTEX and less than 0.20 mg/l for total petroleum hydrocarbons. Volatile organic compounds were not used or generated in the manufacturing process. In addition, there were no recorded spills or visual evidence of VOC type materials. Finally, the toxicity characteristic leachate procedure analytical results for hazardous waste of pond sediments and perimeter ditch soils were non-detect for VOCs, Semi VOCs and selected metals. It was decided that treating the water with activated carbon was unnecessary. In addition, attached as Attachment A is the email correspondence dated November 12, 2007 including previous emails from EPA stating, "I have reviewed the document and I have no problem with the approach".*

Follow-up correspondence dated June 18, 2008, Page 1, Paragraph 2.

This section states that, "A limited number of minor activities were identified during the inspection that comprised the final "punch list" for the projects." The section goes on to describe the four items completed in the spring 2008 visit; including, cleaning up problematic drainage areas, re-grading the northern region and completion of the permanent seeding of areas. Please, provide photographic documentation of the completed work.

*Photos documenting the completed work were taken by the EPA contractor. Eduardo Rovira in a May 11, 2009 email indicated that these photos were acceptable and no further photographic documentation was necessary.*

Follow-up correspondence dated June 18, 2008, Page 2, Paragraph 1.

The section states that, "In addition, sulfur residues in the trough and on the soil surface were removed and properly disposed off-site." Please, provide copies of the manifests for the final disposal runs.

*Attached as Attachment B is a copy of the manifests for the disposal of the soils containing sulfur residues.*



*Appendix A*  
*Email Correspondance Dated*  
*November 12, 2007*



Rovira.Eduardo@epam  
ail.epa.gov

11/12/2007 10:42 AM

To: Joe.Lewandowski@erm.com  
cc: Darren.Quillen@erm.com  
Subject: Re: Former Alliled Chemical Plant - Front Royal, VA

Joe,

Sorry I did not get back to you before. I reviewed the document and I have no problem with the approach.

Regards,

Eduardo Rovira, Jr.  
On-Scene Coordinator  
Eastern Response Branch  
U.S. EPA Middle-Atlantic Region

Joe.Lewandowski@  
erm.com

11/12/2007 10:20  
AM

To  
Eduardo Rovira/R3/USEPA/US@EPA  
cc  
Darren.Quillen@erm.com  
Subject  
Former Alliled Chemical Plant -  
Front Royal, VA

Eduardo,

Have you had time to review our request for on-site treatment of the water?

Joe Lewandowski  
ERM  
200 Harry S. Truman Parkway, Suite 400  
Annapolis, MD 21401  
(410) 266-0006

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This message contains information which may be confidential, proprietary, privileged, or otherwise protected by law from disclosure or use by a third party. If you have received this message in error, please contact us immediately and take the steps necessary to delete the message completely from your computer system. Thank you. Please visit ERM's web site: <http://www.erm.com>

*Appendix B*  
*Manifests for the Disposal of the*  
*Soils Containing Sulfur Residues*



# NON-HAZARDOUS SPECIAL WASTE & ASBESTOS MANIFEST

No. 800-800-8000

If waste is asbestos waste, see Part 1, Section 1. If all other waste, see Part 2, Section 1.

## Section I GENERATOR (Generator's Name, Address, City, State, Zip, and Phone Number)

1. Generator's Name \_\_\_\_\_  
2. Address \_\_\_\_\_  
3. City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
4. Phone Number \_\_\_\_\_

5. Date of Manifest \_\_\_\_\_  
6. If waste is asbestos waste, see Part 1, Section 1. If all other waste, see Part 2, Section 1.

7. Description of Waste \_\_\_\_\_

Quantity	Unit	Weight	Volume	Other
1	1	1	1	1
2	2	2	2	2
3	3	3	3	3
4	4	4	4	4
5	5	5	5	5
6	6	6	6	6
7	7	7	7	7
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10	10	10	10	10

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## Section II TRANSPORTER (Generator's Name, Address, City, State, Zip, and Phone Number)

1. Name \_\_\_\_\_  
2. Address \_\_\_\_\_  
3. City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
4. Phone Number \_\_\_\_\_

5. Date of Manifest \_\_\_\_\_  
6. If waste is asbestos waste, see Part 1, Section 1. If all other waste, see Part 2, Section 1.

7. Description of Waste \_\_\_\_\_

Quantity	Unit	Weight	Volume	Other
1	1	1	1	1
2	2	2	2	2
3	3	3	3	3
4	4	4	4	4
5	5	5	5	5
6	6	6	6	6
7	7	7	7	7
8	8	8	8	8
9	9	9	9	9
10	10	10	10	10

## Section III DESTINATION (Generator's Name, Address, City, State, Zip, and Phone Number)

1. Name \_\_\_\_\_  
2. Address \_\_\_\_\_  
3. City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
4. Phone Number \_\_\_\_\_

5. Date of Manifest \_\_\_\_\_  
6. If waste is asbestos waste, see Part 1, Section 1. If all other waste, see Part 2, Section 1.

Kenneth Robbins



1. The first part of the paper is a review of the literature on the effects of the 1997 Asian financial crisis on the economies of the Asian countries.

2. The second part of the paper is a review of the literature on the effects of the 1997 Asian financial crisis on the economies of the Asian countries.

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1. The first part of the document is a letter from the

author to the editor of the journal.

2. The

second part

is a review of the

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3. The third part

is a discussion of the

results of the study.

4. The fourth part

is a conclusion.

5. The fifth part

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6. The sixth part

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9. The ninth part

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10. The tenth part

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11. The eleventh part

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15. The fifteenth part

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30. The thirtieth part

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31. The thirty-first part

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32. The thirty-second part

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69. The sixty-ninth part

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70. The seventieth part

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80. The eightieth part

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81. The eighty-first part

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100. The hundredth part

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